



**National Association
of Federal Credit Unions**
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NAFCU | Your Direct Connection to Education, Advocacy & Advancement

October 28, 2014

Alfred M. Pollard
General Counsel
Federal Housing Finance Agency
Eighth Floor
400 Seventh Street SW
Washington, DC 20024

RE: 2015-2017 Enterprise Housing Goals - Comments/RIN 2590-AA65

Dear Sir or Madam:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents federal credit unions, I am writing to you regarding the Federal Housing Finance Agency's (FHFA) proposed rule regarding Enterprise Housing Goals for the years 2015-2017. Government-Sponsored Enterprises (GSE), specifically Fannie Mae and Freddie Mac, enable credit unions to obtain the necessary liquidity to create new mortgages for their member-owners by utilizing the secondary market. GSE's serve as valuable partners in credit unions' efforts to meet their members' needs, particularly with regard to mortgage loans.

As indicated in the *Federal Register* notice, the FHFA is required by the Housing Economic Recovery Act of 2008 to establish Fannie Mae's and Freddie Mac's (Enterprises) housing goals. The housing goals establish the portion of the Enterprises' portfolios that must consist of loans made to underserved areas or groups.

Under the proposed rule, the benchmarks that the Enterprises will be expected to meet are the same or higher in some instances than the 2012-14 Enterprise housing goals. The goals are higher for both Fannie Mae and Freddie Mac in the categories of Low-Income Areas Home Purchase Subgoal, Low-Income Refinancing Goals, and Low-Income Subgoal for Small Multifamily. The goals are higher for only Freddie Mac in the categories of Low-Income Goal and Very Low-Income Subgoal.

NAFCU generally supports the proposed rule. As the Enterprises continue to operate under FHFA's conservatorship, it is important that the FHFA regularly performs thorough analysis of its regulations that apply to the entities. However, NAFCU believes that the Enterprises should

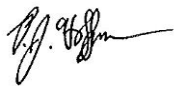
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have flexibility necessary to determine how best to stabilize and improve the conditions of their respective portfolios.

We are fully aware that the Enterprises and the secondary market could change in the future. As we have stated previously, NAFCU strongly supports a healthy and equitable secondary housing market. Any changes to the role of the Enterprises should not be so drastic as to create unnecessary obstacles to continued access for credit unions, who need a stable and equitable secondary market to have continued access to liquidity.

NAFCU appreciates the opportunity to comment on FHFA's 2015-2017 Enterprise Housing Goals. If you have any questions or concerns, please feel free to contact me at pjhoffman@nafcu.org or (703) 842-2212.

Sincerely,

A handwritten signature in black ink, appearing to read "PJ Hoffman", with a long horizontal flourish extending to the right.

PJ Hoffman
Regulatory Affairs Counsel